

INITIAL STUDY

BACKGROUND

Project Title: Grey Eagle Mine Reclamation Project

Project

Description: The proposed project consists of pumping lime slurry into the historical mine workings as part of the water treatment program. This action is expected to reduce the production of acid waters and coincident solubilization of metals, primarily copper, that is occurring in the historical mine workings. This will reduce the need for continued operation of a water treatment plant located in the South Fork of Luther Gulch and allow for a more passive closure program. Proposed is the construction of one or two holes into the lower mine stopes along with one or two holes into the upper most mine stopes. Mine water will be withdrawn from the lower stopes, mixed with lime, and then pumped back into the upper levels of the mine. The lime will neutralize the acidic waters and produce metal hydroxide precipitates which will coat the sulfide minerals as well as settle into the flow pathways. This is expected to reduce the release of metals to the mine waters and the flow of groundwater through the mine. South Fork of Luther Gulch Creek is a tributary of Luther Gulch Creek, which is a tributary of Indian Creek. which is a tributary of the Klamath River.

Proponents: Noranda Grey Eagle Mines Inc.; 1000 Luther Gulch Road; Happy Camp, CA 96039

and

Siskon Gold Corporation; 10556 Combie Road, Suite 6206; Auburn, CA 95602

Lead Agency: Regional Water Quality Control Board, North Coast Region; 5550 Skylane Boulevard, Suite A; Santa Rosa, California 95403

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|------------------------------------|--------------|
|--|--------------------------------------|--|------------------------------------|--------------|

Environmental Factors:

I. LAND USE AND PLANNING. Would the proposal:

- | | | | | |
|---|-------|-------|-------|-------|
| a) Conflict with general plan designation or zoning? | _____ | _____ | _____ | __X__ |
| b) Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project? | _____ | _____ | _____ | __X__ |
| c) Be incompatible with existing land use in the vicinity? | _____ | _____ | _____ | __X__ |
| d) Affect agricultural resources or operations (e.g. impacts to soils or farmlands or impacts from incompatible land uses)? | _____ | _____ | _____ | __X__ |
| e) Disrupt or divide the physical arrangement or an established community (including a low-income or minority community)? | _____ | _____ | _____ | __X__ |

II. POPULATION AND HOUSING. Would the proposal:

- | | | | | |
|--|-------|-------|-------|-------|
| a) Cumulatively exceed official regional or local population projections? | _____ | _____ | _____ | __X__ |
| b) Induce substantial growth in an area either directly or indirectly (e.g. through projects in an undeveloped area or extension of major infrastructure)? | _____ | _____ | _____ | __X__ |
| c) Displace existing housing, especially affordable housing? | _____ | _____ | _____ | __X__ |

III. GEOLOGICAL PROBLEMS. Would the proposal result in or expose people to potential impacts involving:

- | | | | | |
|--|-------|-------|-------|-------|
| a) Fault Rupture? | _____ | _____ | _____ | __X__ |
| b) Seismic ground shaking? | _____ | _____ | _____ | __X__ |
| c) Seismic Ground failure, including liquefaction? | _____ | _____ | _____ | __X__ |
| d) Seiche, tsunami, or volcanic hazard? | _____ | _____ | _____ | __X__ |
| e) Landslides or mudflows? | _____ | _____ | _____ | __X__ |
| f) Erosion, changes in topography or unstable soil conditions from excavation, grading, or fill? | _____ | _____ | _____ | __X__ |
| g) Subsidence of the land? | _____ | _____ | _____ | __X__ |
| h) Expansive soils? | _____ | _____ | _____ | __X__ |

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|---|--------------------------------------|--|------------------------------------|--------------|
| i) Unique geological or physical features? | _____ | _____ | _____ | <u> X </u> |
| IV. WATER. Would the proposal result in: | | | | |
| a) Changes in the absorption rates, drainage patterns, or the rate and amount of surface runoff? | _____ | _____ | _____ | <u> X </u> |
| b) Exposure of people or property to water related hazards such as flooding? | _____ | _____ | _____ | <u> X </u> |
| c) Discharge into surface waters or other alterations of surface water quality, e.g. temperature, dissolved oxygen, or turbidity)? | _____ | _____ | _____ | <u> X </u> |
| d) Changes in the amount of surface water in any water body? | _____ | _____ | _____ | <u> X </u> |
| e) Changes in currents, or the course or direction or water movements? | _____ | _____ | <u> X </u> | _____ |
| f) Changes in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or through substantial loss of groundwater recharge capability? | _____ | _____ | _____ | <u> X </u> |
| g) Altered direction or rate of flow of groundwater? | _____ | _____ | <u> X </u> | _____ |
| h) Impacts to groundwater quality? | _____ | _____ | <u> X </u> | _____ |
| i) Substantial reduction in the amount of groundwater otherwise available for public water supplies? | _____ | _____ | _____ | <u> X </u> |
| V. AIR QUALITY. Would the proposal: | | | | |
| a) Violate any air quality standard or contribute to an existing or projected air quality violation? | _____ | _____ | _____ | <u> X </u> |
| b) Expose sensitive receptors to pollutants? | _____ | _____ | _____ | <u> X </u> |
| c) Alter air movement, moisture, or temperature, or cause any change in climate? | _____ | _____ | _____ | <u> X </u> |
| d) Create objectionable odors? | _____ | _____ | _____ | <u> X </u> |

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|---|--------------------------------------|--|------------------------------------|--------------|
| VI. TRANSPORTATION/CIRCULATION. | | | | |
| Would the proposal result in: | | | | |
| a) Increased vehicle trips or traffic congestion? | _____ | _____ | <u> X </u> | _____ |
| b) Hazards to safety from design features (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)? | _____ | _____ | _____ | <u> X </u> |
| c) Inadequate emergency-access or access to nearby uses? | _____ | _____ | _____ | <u> X </u> |
| d) Insufficient parking capacity on-site or off-site? | _____ | _____ | _____ | <u> X </u> |
| e) Hazards or barriers for pedestrians or bicyclists? | _____ | _____ | _____ | <u> X </u> |
| f) Conflicts with adopted policies supporting alternative transportation (e.g. bus turnouts, bicycle racks)? | _____ | _____ | _____ | <u> X </u> |
| g) Rail, waterborne or air traffic impacts? | _____ | _____ | _____ | <u> X </u> |
| VII. BIOLOGICAL RESOURCES | | | | |
| Would the proposal result in impacts to: | | | | |
| a) Endangered, threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)? | _____ | _____ | _____ | <u> X </u> |
| b) Locally designated species (e.g. heritage trees)? | _____ | _____ | _____ | <u> X </u> |
| c) Locally designated natural communities (e.g. oak forest, coastal habitat, etc.)? | _____ | _____ | _____ | <u> X </u> |
| d) Wetland habitat (e.g. marsh, riparian and vernal pool)? | _____ | _____ | _____ | <u> X </u> |
| e) Wildlife dispersal or migration corridors? | _____ | _____ | _____ | <u> X </u> |
| VIII. ENERGY AND MINERAL RESOURCES. | | | | |
| Would the proposal: | | | | |
| a) Conflict with adopted energy conservation plans? | _____ | _____ | _____ | <u> X </u> |
| b) Use non-renewable resources in a wasteful and insufficient manner? | _____ | _____ | _____ | <u> X </u> |

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| c) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the state? | _____ | _____ | _____ | <u> X </u> |

IX. HAZARDS. Would the proposal involve:

| | | | | |
|---|-------|-------|-------|--------------|
| a) A risk of accidental explosion or releases of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation. | _____ | _____ | _____ | <u> X </u> |
| b) Possible interference with an emergency response plan or emergency evacuation plan? | _____ | _____ | _____ | <u> X </u> |
| c) The creation of any health hazard or potential health hazard | _____ | _____ | _____ | <u> X </u> |
| d) Exposure of people to existing sources of potential health hazard? | _____ | _____ | _____ | <u> X </u> |
| e) Increased fire hazard in areas with flammable brush, grass, or trees? | _____ | _____ | _____ | <u> X </u> |

X. NOISE. Would the proposal result in:

| | | | | |
|---|-------|-------|-------|--------------|
| a) Increases in existing noise levels? | _____ | _____ | _____ | <u> X </u> |
| b) Exposure of people to severe noise levels? | _____ | _____ | _____ | <u> X </u> |

XI. PUBLIC SERVICES. Would the proposal have an effect upon, or result in a need for new or altered government services in any of the following areas:

| | | | | |
|---|-------|-------|-------|--------------|
| a) Fire Protection? | _____ | _____ | _____ | <u> X </u> |
| b) Police Protection? | _____ | _____ | _____ | <u> X </u> |
| c) Schools? | _____ | _____ | _____ | <u> X </u> |
| d) Maintenance of public facilities, including roads? | _____ | _____ | _____ | <u> X </u> |
| e) Other government services? | _____ | _____ | _____ | <u> X </u> |

XII. UTILITIES AND SERVICE SYSTEMS. Would the proposal result in a need for new systems or supplies, or substantial alterations to the following utilities:

| | | | | |
|---------------------------|-------|-------|-------|--------------|
| a) Power or natural gas? | _____ | _____ | _____ | <u> X </u> |
| b) Communication systems? | _____ | _____ | _____ | <u> X </u> |

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|--|--------------------------------------|--|------------------------------------|--------------|
| c) Local or regional water treatment or distribution facilities? | _____ | _____ | _____ | <u> X </u> |
| d) Sewer or septic tanks? | _____ | _____ | _____ | <u> X </u> |
| e) Storm water drainage? | _____ | _____ | _____ | <u> X </u> |
| f) Solid Waste Disposal? | _____ | _____ | _____ | <u> X </u> |
| g) Local or regional water supplies | _____ | _____ | _____ | <u> X </u> |

XIII. AESTHETICS. Would the proposal:

| | | | | |
|---|-------|-------|-------|--------------|
| a) Affect a scenic vista or scenic highway? | _____ | - | - | - |
| b) Have a demonstrable negative aesthetic effect? | _____ | _____ | _____ | <u> X </u> |
| c) Create light or glare? | _____ | _____ | _____ | <u> X </u> |

XIV. CULTURAL RESOURCES. Would the proposal:

| | | | | |
|---|-------|-------|-------|--------------|
| a) Disturb paleontological resources? | _____ | _____ | _____ | <u> X </u> |
| b) Disturb archeological resources? | _____ | _____ | _____ | <u> X </u> |
| c) Affect historical resources? | _____ | _____ | _____ | <u> X </u> |
| d) Have the potential to cause a physical change, which would affect unique ethnic cultural values? | _____ | _____ | _____ | <u> X </u> |
| e) Restrict existing religious or sacred uses within the potential impact area? | _____ | _____ | _____ | <u> X </u> |

XV. RECREATION. Would the proposal:

| | | | | |
|---|-------|-------|-------|--------------|
| a) Increase the demand for neighborhood or regional parks or other recreational facilities? | _____ | _____ | _____ | <u> X </u> |
| b) Affect existing recreational opportunities? | _____ | _____ | _____ | <u> X </u> |

XVI. MANDATORY FINDINGS OF SIGNIFICANCE.

| | | | | |
|--|-------|-------|-------|--------------|
| a) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? | _____ | _____ | _____ | <u> X </u> |
|--|-------|-------|-------|--------------|

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|--|--------------------------------------|--|------------------------------------|--------------|
| b) Does the project have impacts that are individually limited, but cumulatively considerable? (“cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | _____ | _____ | _____ | __X__ |
| d) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? | _____ | _____ | _____ | __X__ |

Discussion of Environmental Factors

- IVe. The proposed project consists of withdrawing water from the lower mine stopes, mixing that water with lime, and then pumping the lime slurry back into the upper levels of the mine. The lime will neutralize the acidic waters and produce metal hydroxide precipitates which will coat the sulfide minerals as well as settle into the flow pathways. Withdrawing of the water will be achieved by drilling a six-inch diameter cased well into the lower stopes of the mine and installing a 500 gallon-per-minute submersible pump. A second cased well will be constructed into the upper stopes where the treated waters will be pumped back into the mine. This will change the movement of groundwater through the Grey Eagle Mine in an effort to improve groundwater quality.
- IVg. Groundwater from the Grey Eagle Mine will be withdrawn from the lower mine stopes, mixed with lime, and then pumped back into the upper levels of the mine. This will alter the rate of flow of the groundwater. As a result of pumping lime into the mine workings, the acidic waters will be neutralized and the production of (dissolution of) metals reduced. Precipitates will form reducing the mobility of dissolved metals; and these metal hydroxide complexes will coat the sulfide minerals to prevent further acid generation. Additionally, these precipitates will settle in the mine workings as well as into the flow paths that carry water from the stopes. There is a possibility that these precipitates might settle into the flow path between the upper stope, where the lime slurry is injected, and the lower stope, where water is withdrawn, and block the movement of water and lime slurry. An additional hole in each stope will allow water to be removed and lime injected within each stope should this occur.
- IVh. Acid drainage and elevated metals in the South Fork of Luther Gulch existed prior to the development of the Noranda Grey Eagle Mine. Construction of the Noranda Tailings Dam and Impoundment covered most of the springs and seeps which had been issuing

low-pH waters with elevated metals into the South Fork of Luther Gulch. It is strongly believed that the historical mine workings are the primary source of acid waters and metal solubilization that manifests the water quality reporting to the seepage collection system at the base of the dam. The pH of the water in the mine has been measured at 2.25. Investigations have determined that placing lime into the historical mine workings could reduce or eliminate the production of acid waters and the liberation of metals from the host rocks. This would improve the groundwater quality flowing into the dam foundation, collected by the seepage collection system, and delivered to the water treatment plant.

- VIa. It is estimated that 625 tons of lime will be required to neutralize the mine during the 100-day campaign. Lime will be delivered to the site in 20-ton trailers; therefore, approximately 32 loads of lime, or approximately one lime truck will be required every three days, for the operation. Highway 96 has been used extensively by logging trucks and trucks of similar capacity in the past; and the added traffic for this operation is not expected to have an adverse impact on the highway. Any impact will be within the 100-day period and can be considered short term.

Determination

On the basis of the evaluation:

I find that the proposed project COULD NOT have a significant effect on the Environment. A NEGATIVE DECLARATION will be prepared. X

I find that although the proposed project COULD have a significant effect on the environment, there WILL NOT BE a significant effect in this case because the mitigation measures described in this report have been incorporated into the proposed project. A NEGATIVE DECLARATION will be prepared. _____

I find that the proposed project MAY have a significant effect(s) on the environment but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigated." Additionally analysis is required, but it must analyze only the effects that remain to be addressed. _____

I find that although the proposed project COULD have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects 1) have been analyzed adequately in an earlier document pursuant to applicable legal standards, and 2) have been avoided or mitigated pursuant to that document, including revisions or mitigation measures that are imposed upon the proposed project. _____

I find that the proposed project may have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT IS REQUIRED.

Lee A Michlin
Executive Officer

Date